

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al*,

Debtors.

:
:
:
:
:
:
:

Chapter 11

Case No. 22-10964 (MG)

**PROPOSED ORDER GRANTING BRADLEY CONDIT'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1)**

On [date of hearing], the Motion (the “**Motion**”) of Bradley Condit, dated [date of filing], came before the Court, for relief from the automatic stay imposed pursuant to 11 U.S.C. § 362(a) in the civil action pending in the Southern District of New York and titled *Bradley Condit v. Celsius Network LLC and Yaron Shalem*, Civil Action No. 22-cv-5452 (CS) (the “**Civil Action**”) in which Debtor Celsius Network LLC and its former CFO Yaron Shalem are defendants. This Court, having considered the evidence presented and the arguments of the parties, and with good cause appearing therefor, grants the Motion. It is hereby **ORDERED**, that the automatic stay in effect pursuant to 11 U.S.C. § 362(a) is lifted in the Civil Action.

New York, New York

Dated: _____, 2022

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE